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November 8, 2024

By ECF

Magistrate Judge Lois Bloom
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Louis v. New York City Department of Education, et al.
No. 22 Civ. 07787 (DG)(LB)

Dear Judge Bloom:

I am an Assistant Corporation Counsel in the Office of Muriel Goode-Trufant, Acting Corporation Counsel of the City of New York, assigned to represent Defendants, the New York City Department of Education, the City of New York Office of Food and Nutrition Services (“DOE”), Andrew Goodman, Esther Semple, Derrick Mitchell, and Wendy John (collectively, “Defendants”), in the above-referenced action. The parties write to jointly request a 30-day extension of time for the Parties to either file their stipulation of dismissal or, alternatively, to file a joint status report.

Plaintiff commenced this action on December 19, 2023, and filed an Amended Complaint on March 6, 2024. See ECF No. 44. At the pre-motion conference to discuss Defendants’ anticipated Motion to Dismiss the Amended Complaint, the Court referred the parties to mediation. See Text Order Referring Case to Mediation, dated June 27, 2024. On September 9, 2024, your Honor ordered that the parties “complete mediation by November 10, 2024” as well as “file a joint status letter by November 17, 2024.” See Text Order dated September 9, 2024. On November 6, 2024, the Parties appeared before Magistrate Judge Viktor Pohorelsky (Ret.) for mediation and reached a settlement in principle. However, the parties need additional time to negotiate the agreement’s release language in light of Plaintiff’s claims in other forums relating to her pension and workers compensation.

The parties now request a 30-day extension of time to complete mediation and to either file a stipulation of dismissal or, alternatively, a joint status report advising the Court as to

the status of settlement. Thus, the parties jointly request an extension until December 17, 2024, to file a stipulation of dismissal or joint status letter.

The parties appreciate the Court's attention and consideration of this request.

Respectfully Submitted,

/s/

René L. Macioce

Assistant Corporation Counsel

cc: Clela Errington, Esq.,
Megan Sarah Goddard, Esq.
Attorney for plaintiff (By ECF)